

<i>SERFF Tracking Number:</i>	<i>SYMT-127866527</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Symetra Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>50399</i>
<i>Company Tracking Number:</i>	<i>L-10078 11/10</i>		
<i>TOI:</i>	<i>L09I Individual Life - Flexible Premium</i>	<i>Sub-TOI:</i>	<i>L09I.001 Single Life</i>
	<i>Adjustable Life</i>		
<i>Product Name:</i>	<i>L-10078 10/11</i>		
<i>Project Name/Number:</i>	<i>AUL Loan Interest Endorsement/L-10078 10/11</i>		

## Filing at a Glance

Company: Symetra Life Insurance Company

Product Name: L-10078 10/11

TOI: L09I Individual Life - Flexible Premium

Adjustable Life

Sub-TOI: L09I.001 Single Life

Filing Type: Form

SERFF Tr Num: SYMT-127866527 State: Arkansas

SERFF Status: Closed-Approved- State Tr Num: 50399

Closed

Co Tr Num: L-10078 11/10

State Status: Approved-Closed

Reviewer(s): Linda Bird

Authors: Lisa Hampton, Jill Morgan Disposition Date: 12/09/2011

Date Submitted: 12/05/2011 Disposition Status: Approved-

Closed

Implementation Date Requested: 01/09/2012

Implementation Date:

State Filing Description:

## General Information

Project Name: AUL Loan Interest Endorsement

Project Number: L-10078 10/11

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 12/09/2011

State Status Changed: 12/09/2011

Created By: Lisa Hampton

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Lisa Hampton

Filing Description:

Symetra Life Insurance Company

NAIC# 1129-68608

FEIN# 91-0742147

RE: Symetra Life Insurance Company

NAIC No. 1129-68608, FEIN: 91-0742147

RE: L-10078 10/11 – Loan Interest Endorsement

SERFF Tracking Number:	SYMT-127866527	State:	Arkansas
Filing Company:	Symetra Life Insurance Company	State Tracking Number:	50399
Company Tracking Number:	L-10078 11/10		
TOI:	L09I Individual Life - Flexible Premium Adjustable Life	Sub-TOI:	L09I.001 Single Life
Product Name:	L-10078 10/11		
Project Name/Number:	AUL Loan Interest Endorsement/L-10078 10/11		

We are submitting copies of final versions of the above referenced form for your review and approval. The form is new and does not replace any form currently in use in your state. The content does not deviate from normal company or industry standards.

L-10078 10/11, Loan Interest Endorsement, revises the loan interest language of universal life policy L-9903 11/01, approved in your state on 1/22/02.

During a recent review of our policy forms and procedures, we determined that there is a minor inaccuracy in the wording regarding when, and how, loan interest is calculated on a policy loan. The current wording describes a loan interest rate that could be higher than what we will actually charge and we want to correct that discrepancy. There is no change to how the interest rate is calculated. There has been no harm or loss to any policy owner.

We will be issuing this endorsement to all owners of the affected policy, along with a letter of explanation. The policy is no longer being offered for sale.

In addition to the endorsement we are submitting as supporting documentation a redlined copy of the loan interest provision showing the changes.

Thank you for your consideration of this submission.

If you have questions, please contact me at the numbers noted below.

Sincerely,  
Elizabeth A. Hampton  
Contract Analyst  
lisa.hampton@symetra.com  
425-256-5468  
800-796-3872 ext 65468

## Company and Contact

### Filing Contact Information

Lisa Hampton, Senior Compliance Analyst	lisa.hampton@symetra.com
777 108th Ave. NE, Suite 1200	425-256-5468 [Phone]

SERFF Tracking Number: SYMT-127866527 State: Arkansas  
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Bellevue, WA 98004-5135 425-256-5466 [FAX]

### Filing Company Information

Symetra Life Insurance Company	CoCode: 68608	State of Domicile: Washington
777 108th Ave NE, Suite 1200	Group Code: 1129	Company Type: Insurance
Bellevue, WA 98004-5135	Group Name:	State ID Number:
(800) 796-3872 ext. [Phone]	FEIN Number: 91-0742147	

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### Filing Fees

Fee Required?	Yes
Fee Amount:	\$50.00
Retaliatory?	No
Fee Explanation:	1 endorsement @50.00
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Symetra Life Insurance Company	\$50.00	12/05/2011	54254570

SERFF Tracking Number:	SYMT-127866527	State:	Arkansas
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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	12/09/2011	12/09/2011

<i>SERFF Tracking Number:</i>	<i>SYMT-127866527</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Symetra Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>50399</i>
<i>Company Tracking Number:</i>	<i>L-10078 11/10</i>		
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	<i>Adjustable Life</i>		
<i>Product Name:</i>	<i>L-10078 10/11</i>		
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## Disposition

Disposition Date: 12/09/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number:	SYMT-127866527	State:	Arkansas
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Health - Actuarial Justification		No
Supporting Document	Outline of Coverage		No
Supporting Document	Markup of Changes		Yes
Form	Loan Interest Endorsement		Yes

SERFF Tracking Number: SYMT-127866527 State: Arkansas

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Company Tracking Number: L-10078 11/10

TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.001 Single Life

Adjustable Life

Product Name: L-10078 10/11

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## Form Schedule

Lead Form Number: L-10078 11/10

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	L-10078 10/11	Policy/Cont Loan Interest ract/Fratern Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		50.800	L-10078 10-11 12-05-2011.pdf

## **LOAN INTEREST ENDORSEMENT**

This Endorsement is added to and becomes a part of the Policy to which it is attached. In the case of conflict between the provisions of the Policy and this Endorsement, the provisions of this Endorsement will control.

The Loan Interest provision of your Policy, Section 4.7, has been changed to read as follows.

### **4.7 Loan Interest**

Interest is payable in advance and will be charged on any policy loan from the date of the loan. At the time a loan is made, we will inform you of the initial loan interest rate. Interest will again be due and payable on each Policy Anniversary. If the interest is not paid, it will be treated as part of the loaned amount and will bear interest at the loan rate.

For the first 10 policy years, the loan interest rate will never be more than 2% greater than the rate credited to that part of Accumulation Fund that is security for the loan.

The loan interest charged on Preferred Loans, as defined in Section 4.8, and on any new or existing loans after the 10th Policy Anniversary will be equal to the interest credited to the Accumulation Fund.

We will determine the loan interest rate at each Policy Anniversary. If we change the rate we will inform you. The maximum loan interest rate for a policy year shall be the greater of:

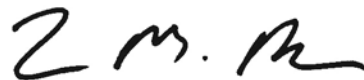
- (1) the Published Monthly Average, as defined below, for the calendar month that ends two months before the Policy Anniversary; or
- (2) 4%.

Published Monthly Average means the Monthly Average Corporate yield shown in Moody's Corporate Bond Yield Averages published by Moody's Investors Service, Inc., or any successor service.

If such averages are no longer published, we will use such other averages as may be established by regulation by the insurance supervisory official of the jurisdiction in which the policy is delivered. In no event will the loan interest rate for a policy year be greater than the maximum rate permitted by applicable law.

No change in the rate will be less than 0.5% a year. We may increase the rate whenever the maximum rate as determined under item 1 of the preceding paragraph increases by 0.5% or more. We will reduce the rate to or below the maximum rate as determined under item 1 of the preceding paragraph if such maximum is lower than the rate being charged by 0.5% or more.

Symetra Life Insurance Company



[Thomas M. Marra]  
[President]



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Project Name/Number:	AUL Loan Interest Endorsement/L-10078 10/11		

## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b>	Flesch Certification	
<b>Comments:</b>		
<b>Attachment:</b>		
AR Certification.pdf		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b>	Application	
<b>Bypass Reason:</b>	The policy to which this endorsement will be attached is no longer sold.	
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b>	Health - Actuarial Justification	
<b>Bypass Reason:</b>	This is an individual life product.	
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b>	Outline of Coverage	
<b>Bypass Reason:</b>	This is a life product.	
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b>	Markup of Changes	
<b>Comments:</b>		
<b>Attachment:</b>		
4.7 Loan Interest Markup.pdf		

State of Arkansas

CERTIFICATION

**L-10078 10/11**

I hereby certify that we are in compliance with 23-79-138; Bulletin 6-87; Bulletin 11-88; and Regulation 49.

A handwritten signature in cursive script that reads "Laura Johnson".

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Laura Johnson, A.V.P.  
Symetra Life Insurance Company

#### **4.7 Loan Interest**

Interest is payable in advance and will be charged on any policy loan from the date of the loan. At the time a loan is made, we will inform you of the initial loan interest rate. Interest will again be due and payable on each Policy Anniversary. If the interest is not paid, it will be treated as part of the loaned amount and will bear interest at the loan rate.

For the first 10 policy years, the loan interest rate will never be more than 2% greater than the rate credited to that part of Accumulation Fund that is security for the loan.

The loan interest charged on Preferred Loans, as defined in Section 4.8, and on any new or existing loans after the 10th Policy Anniversary will be equal to the interest credited to the Accumulation Fund.

We will determine the loan interest rate from time to time. If we change the rate we will inform you. The maximum loan interest rate for a policy year shall be the greater of:

- (1) the Published Monthly Average, as defined below, for the calendar month that ends two months before the Policy Anniversary date of the loan; or
- (2) 45%.

Published Monthly Average means the Monthly Average Corporate yield shown in Moody's Corporate Bond Yield Averages published by Moody's Investors Service, Inc., or any successor service.

If such averages are no longer published, we will use such other averages as may be established by regulation by the insurance supervisory official of the jurisdiction in which the policy is delivered. In no event will the loan interest rate for a policy year be greater than the maximum rate permitted by applicable law.

No change in the rate will be less than 0.5% a year. We may increase the rate whenever the maximum rate as determined under item 1 of the preceding paragraph increases by 0.5% or more. We will reduce the rate to or below the maximum rate as determined under item 1 of the preceding paragraph if such maximum is lower than the rate being charged by 0.5% or more.